

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

**CHRISTOPHER HAYS and
LINSAY BRADBURY**

PLAINTIFFS

v.

CASE NO. CV-19-466-JM

**BRIGGS RENTALS, LLC and
BOBBY BRIGGS**

DEFENDANTS

DEFENDANTS' PRETRIAL DISCLOSURE SHEET

Comes now the Defendants to this lawsuit Bobby Briggs and Briggs Rentals, LLC, and for their Pretrial Disclosure Sheet, state as follows:

Identify of the party submitting information.

Defendants Briggs Rentals, LLC and Bobby Briggs, through undersigned counsel.

Names, addresses, and telephone numbers of all counsel for the parties.

Kevin Lemley, 206 Plaza Blvd., Suite E, Cabot, AR 72023, (501) 512-0098,

kevin@lemley-law.com.

A brief summary of the claims and relief sought.

Plaintiff Christopher Hays was never an employee of Defendants. While Plaintiff Lindsay Bradbury was an employee, she was responsible for reporting all time. Defendants do not owe Plaintiffs any unpaid overtime compensation or liquidated damages.

Prospects for settlement.

This case has been referred to U.S. Magistrate Judge Beth Deere for a settlement conference.

The basis for jurisdiction.

Defendants do not object to this Court's jurisdiction.

A list of pending motions.

None.

A concise summary of the facts.

Plaintiff Christopher Hays was never an employee of Defendants. While Plaintiff Lindsay Bradbury was an employee, she was responsible for reporting all time. Defendants do not owe Plaintiffs any unpaid overtime compensation or liquidated damages.

All proposed stipulations.

Plaintiff Lindsay Bradbury was an employee of Defendant Briggs Rentals, LLC.

The issues of fact expected to be contested.

Whether Plaintiff Christopher Hays was a covered employee.

Whether Defendants were covered employers.

The number of hours that Plaintiffs worked.

The issues of law expected to be contested.

Whether Defendants are entitled to the good faith defense against liquidated damages.

A list and brief description of exhibits.

Defendants expect to offer records of Plaintiff Bradbury's hours and checks paid to Plaintiff Christopher Hays maintained by Defendants' accounting firm.

The names, addresses and telephone number of witnesses for the party.

Defendants expect to call:

Bobby Briggs

Tiffany Dycus, 501-470-1100

Heather Pasco, 346-348-4659

Kathy Kite, 501-328-0096

Linda Peacock, 501-205-6981

Robert _____, 501-993-5343

Defendants may call Sharon McGagtey, 501-548-424

The current status of discovery.

Discovery is complete.

An estimate of the length of trial.

Defendants agree with Plaintiffs that trial would require two days.

Respectfully submitted,

Kevin Lemley

Kevin M. Lemley, Ark Bar # 2005034

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Cabot, AR 72023

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kevin@lemley-law.com

Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that, on this 1st day of August, 2023, I electronically filed the foregoing with the Court's CM/ECF System, which shall send notification of such filing to counsel of record for Plaintiffs.

Kevin Lemley

Kevin M. Lemley